

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
STEPHEN GRAY, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :
THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC., :
THE 401(k) INVESTMENT :
COMMITTEE, and JOHN DOES 1 - 20, :

Defendants. :
-----X

SHAUN ROSE, Individually and On :
Behalf of All Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :
THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC., :
THE 401(k) INVESTMENT :
COMMITTEE, and JOHN DOES 1 - 10, :

Defendants. :
-----X

MEREDITH TRANBERG, individually :
and on behalf of all others similarly situated :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :
THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC., :
THE 401(k) INVESTMENT :
COMMITTEE, and JOHN DOES 1 - 20, :

Defendants. :
-----X

Civil Action No: 07 Civ. 9790 (SHS)

**NOTICE OF MOTION TO
ADMIT BRUCE K.
RINALDI PRO HAC VICE**

FILED
U.S. DISTRICT COURT
2008 JAN 15 PM 4:30
S.D. OF N.Y.

Civil Action No: 07 Civ. 10294

Civil Action No: 07 Civ. 10341

JAN 15 2008

#638347 25 -

-----X
ANTON RAPPOLD, individually and on :
behalf of all others similarly situated, :
 :
Plaintiff, : Civil Action No: 07 Civ. 10396
v. :
 :
CITIGROUP INC., CITIBANK, N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and JOHN :
and JANE DOES 1 - 10, :
 :
Defendants. :
-----X

SAMIER TADROS, on Behalf of All :
Others Similarly Situated, :
 :
Plaintiff, : Civil Action No: 07 Civ. 10442
v. :
 :
CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC.) :
and JOHN DOES 21-40 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE INVESTMENT COMMITTEE :
OF THE CITIGROUP INC. 401(K) PLAN), :
 :
Defendants. :
-----X

-----X
STEPHAN FIORINO, individually and on :
behalf of all others similarly situated, :
 :
Plaintiff, : Civil Action No: 07 Civ. 10458
v. :
 :
CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :
 :
Defendants. :
-----X

JAMES BOLLA, individually and on behalf :
of all others similarly situated, :
 :
Plaintiff, : Civil Action No: 07 Civ. 10461
v. :
 :
CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :
 :
Defendants. :
-----X

-----X
 MARK GEROULO, individually, on behalf :
 of the CITIGROUP 401(k) Plan, the :
 CITIBUILDER 401 (K) PLAN FOR :
 PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :
 THE PLAN ADMINISTRATIVE :
 COMMITTEE OF CITIGROUP, INC., :
 MICHAEL E. SCHLEIN, JOHN DOES :
 1-10, THE CITIGROUP 401(k) PLAN :
 INVESTMENT COMMITTEE and JOHN :
 DOES 10-20, C. MICHAEL :
 ARMSTRONG, ALAN J.P. BELDA, :
 GEORGE DAVID, KENNETH T. DERR, :
 JOHN M. DEUTCH, ROBERTO :
 HERNANDEZ, ANN DIBBLE JORDAN, :
 ANDREW N. LIVERIS, DUDLEY C. :
 MECUM, ANNE M. MULCAHY, :
 RICHARD D. PARSONS, ANDRALL E. :
 PEARSON, CHARLES PRINCE, JUDITH :
 RODIN, ROBERT E. RUBIN, FRANKLIN :
 A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X	
ALAN STEVENS, on Behalf of Himself	:
and All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CITIBANK, N.A,	:
CHARLES PRINCE, C. MICHAEL	:
ARMSTRONG, ALAIN J.P. BELDA,	:
GEORGE DAVID, KENNETH T. DERR,	:
JOHN M. DEUTCH, PETER JOHNSON,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANDREW N. LIVERIS, ANNE	:
MULCAHEY, RICHARD D. PARSONS,	:
JUDITH RODIN, ROBERT E. RUBIN,	:
ROBERT L. RYAN, FRANKLIN A.	:
THOMAS, THE PLANS	:
ADMINISTRATION COMMITTEE OF	:
CITIGROUP, INC., THE INVESTMENT	:
COMMITTEE and JOHN DOES 1-30,	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11156

-----X	
STEPHEN GOLDSTEIN, on Behalf of	:
Himself and a Class of Persons Similarly	:
Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., THE PLANS	:
ADMINISTRATION COMMITTEE OF	:
CITIGROUP, INC., MICHAEL E.	:
SCHLEIN, CHARLES PRINCE, C.	:
MICHAEL ARMSTRONG, ALAIN J.P.	:
BELDA, GEORGE DAVID, KENNETH T.	:
DERR, JOHN M. DEUTCH, ROBERTO	:
HERNANDEZ RAMIREZ, ANDREW N.	:
LIVERIS, ANNE MULCAHEY,	:
RICHARD D. PARSONS, JUDITH	:
RODIN, ROBERT E. RUBIN, ROBERT L.	:
RYAN, AND FRANKLIN A. THOMAS,	:
And JOHN DOES 1-30,	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11158

-----X	
CHRIS SOUTHARD, on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES O.	:
PRINCE, C. MICHAEL ARMSTRONG,	:
ALAIN J.P. BELDA, GEORGE DAVID,	:
KENNETH T. DERR, JOHN M. DEUTCH,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANN DIBBLE JORDAN, KLAUS	:
KLEINFELD, ANDREW N. LIVERIS,	:
ANNE MULCAHY, RICHARD D.	:
PARSONS, JUDITH RODIN, ROBERT E.	:
RUBIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, JOHN DOES 1-20 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.)	:
and JOHN DOES 21-40 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE INVESTMENT COMMITTEE	:
OF THE CITIGROUP INC. 401(K) PLAN),	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11164

FRANCIA BRICK, individually and on	:
Behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLAN'S ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP, INC.,	:
THE 401(k) INVESTMENT COMMITTEE,	:
And JOHN DOES 1-10,	:
	:
Defendants.	:

Civil Action No: 07 Civ. 11369

-----X
WILLIAM and PATRICIA WOODWARD, :
individually and on Behalf of All Others :
Similarly Situated, :
:
Plaintiffs, : Civil Action No: 07cv11207
v. :
:
CITIGROUP INC., CHARLES PRINCE, :
ROBERT E. RUBIN, C. MICHAEL :
ARMSTRONG, ALAIN J. P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, ROBERTO :
HERNANDEZ RAMIREZ, ANDREW N. :
LIVERIS, ANN MULCAHEY, RICHARD :
D. PARSONS, JUDITH RODIN, ROBERT :
L. RYAN, FRANKLIN A. THOMAS, ANN :
DIBBLE JORDAN, KLAUS KLEINFELD :
AND DUDLEY C. MECUM, and JOHN :
and JANE DOES 1-10, :
:
Defendants. :

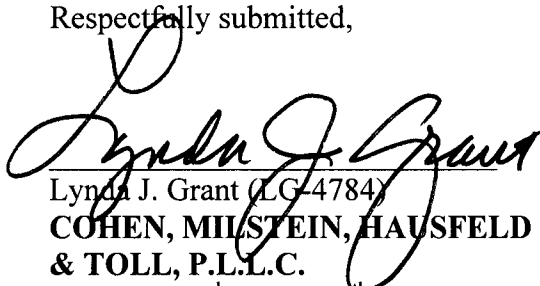
**NOTICE OF MOTION TO ADMIT
BRUCE F. RINALDI *PRO HAC VICE***

PLEASE TAKE NOTICE that upon the annexed Declaration of Lynda J. Grant, the Affidavit of Bruce F. Rinaldi and the Certificate of Good Standing annexed thereto, the undersigned will move this Court, before the Honorable Sidney H. Stein on a date to be determined by the Court, in the United States Courthouse, 500 Pearl Street, Courtroom 23A, New York, New York 10007, for an Order (attached hereto), pursuant to Rule

1.3(c) of the Local Rules of the United States District Courts for the Southern District and Eastern Districts of New York, admitting Bruce F. Rinaldi *pro hac vice*.

Dated: January 15, 2008

Respectfully submitted,



Lynda J. Grant (LG-4784)
**COHEN, MILSTEIN, HAUSFELD
& TOLL, P.L.L.C.**
150 East 52nd Street, 30th Floor
New York, New York 10022
(212) 838-7797

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
STEPHEN GRAY, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,
THE PLANS ADMINISTRATIVE
COMMITTEE OF CITIGROUP INC.,
THE 401(k) INVESTMENT
COMMITTEE, and JOHN DOES 1 - 20,

Defendants.
-----X

Civil Action No: 07 Civ. 9790 (SHS)

SHAUN ROSE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,
THE PLANS ADMINISTRATIVE
COMMITTEE OF CITIGROUP INC.,
THE 401(k) INVESTMENT
COMMITTEE, and JOHN DOES 1 - 10,

Defendants.
-----X

Civil Action No: 07 Civ. 10294

MEREDITH TRANBERG, individually
and on behalf of all others similarly situated

Plaintiff,

v.

CITIGROUP INC., CHARLES PRINCE,
THE PLANS ADMINISTRATIVE
COMMITTEE OF CITIGROUP INC.,
THE 401(k) INVESTMENT
COMMITTEE, and JOHN DOES 1 - 20,

Defendants.
-----X

Civil Action No: 07 Civ. 10341

-----X
ANTON RAPPOLD, individually and on :
behalf of all others similarly situated, :
 :
Plaintiff, : Civil Action No: 07 Civ. 10396
v. :
 :
CITIGROUP INC., CITIBANK, N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and JOHN :
and JANE DOES 1 - 10, :
 :
Defendants. :
-----X

SAMIER TADROS, on Behalf of All :
Others Similarly Situated, :
 :
Plaintiff, : Civil Action No: 07 Civ. 10442
v. :
 :
CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC.) :
and JOHN DOES 21-40 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE INVESTMENT COMMITTEE :
OF THE CITIGROUP INC. 401(K) PLAN), :
 :
Defendants. :
-----X

-----X
STEPHAN FIORINO, individually and on :
behalf of all others similarly situated, :
:
Plaintiff, : Civil Action No: 07 Civ. 10458
v. :
:
CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :
:
Defendants. :
-----X

JAMES BOLLA, individually and on behalf :
of all others similarly situated, :
:
Plaintiff, : Civil Action No: 07 Civ. 10461
v. :
:
CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :
:
Defendants. :
-----X

-----X
MARK GEROULO, individually, on behalf :
of the CITIGROUP 401(k) Plan, the :
CITIBUILDER 401 (K) PLAN FOR :
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :
THE PLAN ADMINISTRATIVE :
COMMITTEE OF CITIGROUP, INC., :
MICHAEL E. SCHLEIN, JOHN DOES :
1-10, THE CITIGROUP 401(k) PLAN :
INVESTMENT COMMITTEE and JOHN :
DOES 10-20, C. MICHAEL :
ARMSTRONG, ALAN J.P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, ROBERTO :
HERNANDEZ, ANN DIBBLE JORDAN, :
ANDREW N. LIVERIS, DUDLEY C. :
MECUM, ANNE M. MULCAHY, :
RICHARD D. PARSONS, ANDRALL E. :
PEARSON, CHARLES PRINCE, JUDITH :
RODIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X
ALAN STEVENS, on Behalf of Himself
and All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A,
CHARLES PRINCE, C. MICHAEL
ARMSTRONG, ALAIN J.P. BELDA,
GEORGE DAVID, KENNETH T. DERR,
JOHN M. DEUTCH, PETER JOHNSON,
ROBERTO HERNANDEZ RAMIREZ,
ANDREW N. LIVERIS, ANNE
MULCAHEY, RICHARD D. PARSONS,
JUDITH RODIN, ROBERT E. RUBIN,
ROBERT L. RYAN, FRANKLIN A.
THOMAS, THE PLANS
ADMINISTRATION COMMITTEE OF
CITIGROUP, INC., THE INVESTMENT
COMMITTEE and JOHN DOES 1-30,

Defendants.
-----X

Civil Action No: 07 Civ. 11156

STEPHEN GOLDSTEIN, on Behalf of
Himself and a Class of Persons Similarly
Situated,

Plaintiff,

v.

CITIGROUP INC., THE PLANS
ADMINISTRATION COMMITTEE OF
CITIGROUP, INC., MICHAEL E.
SCHLEIN, CHARLES PRINCE, C.
MICHAEL ARMSTRONG, ALAIN J.P.
BELDA, GEORGE DAVID, KENNETH T.
DERR, JOHN M. DEUTCH, ROBERTO
HERNANDEZ RAMIREZ, ANDREW N.
LIVERIS, ANNE MULCAHEY,
RICHARD D. PARSONS, JUDITH
RODIN, ROBERT E. RUBIN, ROBERT L.
RYAN, AND FRANKLIN A. THOMAS,
And JOHN DOES 1-30,

Defendants.

Civil Action No: 07 Civ. 11158

-----X		
CHRIS SOUTHARD, on Behalf of All	:	
Others Similarly Situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 11164
v.	:	
	:	
CITIGROUP INC., CHARLES O.	:	
PRINCE, C. MICHAEL ARMSTRONG,	:	
ALAIN J.P. BELDA, GEORGE DAVID,	:	
KENNETH T. DERR, JOHN M. DEUTCH,	:	
ROBERTO HERNANDEZ RAMIREZ,	:	
ANN DIBBLE JORDAN, KLAUS	:	
KLEINFELD, ANDREW N. LIVERIS,	:	
ANNE MULCAHY, RICHARD D.	:	
PARSONS, JUDITH RODIN, ROBERT E.	:	
RUBIN, ROBERT E. RUBIN, FRANKLIN	:	
A. THOMAS, JOHN DOES 1-20 (BEING	:	
CURRENT AND FORMER MEMBERS	:	
OF THE PLANS ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP INC.)	:	
and JOHN DOES 21-40 (BEING	:	
CURRENT AND FORMER MEMBERS	:	
OF THE INVESTMENT COMMITTEE	:	
OF THE CITIGROUP INC. 401(K) PLAN),	:	
	:	
Defendants.	:	

FRANCIA BRICK, individually and on	:	
Behalf of all others similarly situated,	:	
	:	
Plaintiff,	:	Civil Action No: 07 Civ. 11369
v.	:	
	:	
CITIGROUP INC., CHARLES PRINCE,	:	
THE PLAN'S ADMINISTRATIVE	:	
COMMITTEE OF CITIGROUP, INC.,	:	
THE 401(k) INVESTMENT COMMITTEE,	:	
And JOHN DOES 1-10,	:	
	:	
Defendants.	:	

-X

WILLIAM and PATRICIA WOODWARD, :	
individually and on Behalf of All Others :	
Similarly Situated, :	
Plaintiffs, :	Civil Action No: 07cv11207
v. :	
CITIGROUP INC., CHARLES PRINCE, :	
ROBERT E. RUBIN, C. MICHAEL :	
ARMSTRONG, ALAIN J. P. BELDA, :	
GEORGE DAVID, KENNETH T. DERR, :	
JOHN M. DEUTCH, ROBERTO :	
HERNANDEZ RAMIREZ, ANDREW N. :	
LIVERIS, ANN MULCAHEY, RICHARD :	
D. PARSONS, JUDITH RODIN, ROBERT :	
L. RYAN, FRANKLIN A. THOMAS, ANN :	
DIBBLE JORDAN, KLAUS KLEINFELD :	
AND DUDLEY C. MECUM, and JOHN :	
and JANE DOES 1-10, :	
Defendants. :	

**DECLARATION OF LYNDA J. GRANT IN SUPPORT
OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, Lynda J. Grant, hereby declare as follows:

1. I am an attorney admitted to practice in the State of New York, and in the Southern and Eastern Districts of New York. I submit this Declaration in support of the motion to admit Bruce F. Rinaldi to the United States District Court for the Southern District of New York *pro hac vice* for purposes of this action.

2. I agree to act as local counsel for Bruce F. Rinaldi and to observe the Rules of this Court governing the conduct of attorneys.

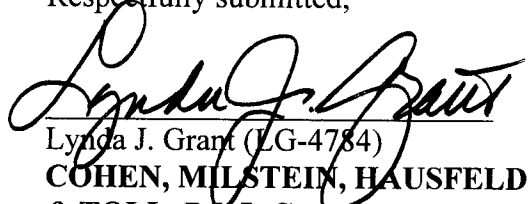
3. Bruce F. Rinaldi is a member in good standing of the Bar of the District of Columbia.

For the foregoing reasons, it is respectfully requested that Bruce F. Rinaldi be admitted *pro hac vice* to the United States District Court for the Southern District of New York for purposes of this action.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January 15, 2008

Respectfully submitted,



Lynda J. Grant (LG-4784)
**COHEN, MILSTEIN, HAUSFELD
& TOLL, P.L.L.C.**
150 East 52nd Street, 30th Floor
New York, New York 10022
(212) 838-7797

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
STEPHEN GRAY, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	
SHAUN ROSE, Individually and On	:
Behalf of All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 10,	:
	:
Defendants.	:
-----X	
MEREDITH TRANBERG, individually	:
and on behalf of all others similarly situated	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 9790 (SHS)

**DECLARATION OF BRUCE F.
RINALDI IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

Civil Action No: 07 Civ. 10294

Civil Action No: 07 Civ. 10341

-----X
ANTON RAPPOLD, individually and on :
behalf of all others similarly situated, :
 :
Plaintiff, :
v. :
 :
CITIGROUP INC., CITIBANK, N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and JOHN :
and JANE DOES 1 - 10, :
 :
Defendants. :
-----X

Civil Action No: 07 Civ. 10396

SAMIER TADROS, on Behalf of All :
Others Similarly Situated, :
 :
Plaintiff, :
v. :
 :
CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC.) :
and JOHN DOES 21-40 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE INVESTMENT COMMITTEE :
OF THE CITIGROUP INC. 401(K) PLAN), :
 :
Defendants. :
-----X

Civil Action No: 07 Civ. 10442

-----X
STEPHAN FIORINO, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10458

-----X
JAMES BOLLA, individually and on behalf :
of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10461

-----X
MARK GEROULO, individually, on behalf :
of the CITIGROUP 401(k) Plan, the :
CITIBUILDER 401 (K) PLAN FOR :
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :
THE PLAN ADMINISTRATIVE :
COMMITTEE OF CITIGROUP, INC., :
MICHAEL E. SCHLEIN, JOHN DOES :
1-10, THE CITIGROUP 401(k) PLAN :
INVESTMENT COMMITTEE and JOHN :
DOES 10-20, C. MICHAEL :
ARMSTRONG, ALAN J.P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, ROBERTO :
HERNANDEZ, ANN DIBBLE JORDAN, :
ANDREW N. LIVERIS, DUDLEY C. :
MECUM, ANNE M. MULCAHY, :
RICHARD D. PARSONS, ANDRALL E. :
PEARSON, CHARLES PRINCE, JUDITH :
RODIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X
ALAN STEVENS, on Behalf of Himself :
and All Others Similarly Situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11156

CITIGROUP INC., CITIBANK, N.A, :
CHARLES PRINCE, C. MICHAEL :
ARMSTRONG, ALAIN J.P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, PETER JOHNSON, :
ROBERTO HERNANDEZ RAMIREZ, :
ANDREW N. LIVERIS, ANNE :
MULCAHEY, RICHARD D. PARSONS, :
JUDITH RODIN, ROBERT E. RUBIN, :
ROBERT L. RYAN, FRANKLIN A. :
THOMAS, THE PLANS :
ADMINISTRATION COMMITTEE OF :
CITIGROUP, INC., THE INVESTMENT :
COMMITTEE and JOHN DOES 1-30, :

Defendants. :

-----X
STEPHEN GOLDSTEIN, on Behalf of :
Himself and a Class of Persons Similarly :
Situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11158

CITIGROUP INC., THE PLANS :
ADMINISTRATION COMMITTEE OF :
CITIGROUP, INC., MICHAEL E. :
SCHLEIN, CHARLES PRINCE, C. :
MICHAEL ARMSTRONG, ALAIN J.P. :
BELDA, GEORGE DAVID, KENNETH T. :
DERR, JOHN M. DEUTCH, ROBERTO :
HERNANDEZ RAMIREZ, ANDREW N. :
LIVERIS, ANNE MULCAHEY, :
RICHARD D. PARSONS, JUDITH :
RODIN, ROBERT E. RUBIN, ROBERT L. :
RYAN, AND FRANKLIN A. THOMAS, :
And JOHN DOES 1-30, :

Defendants. :

-----X
CHRIS SOUTHARD, on Behalf of All :
Others Similarly Situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11164

CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC.) :
and JOHN DOES 21-40 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE INVESTMENT COMMITTEE :
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

FRANCIA BRICK, individually and on :
Behalf of all others similarly situated, :

Plaintiff, :

v. :

Civil Action No: 07 Civ. 11369

CITIGROUP INC., CHARLES PRINCE, :
THE PLAN'S ADMINISTRATIVE :
COMMITTEE OF CITIGROUP, INC., :
THE 401(k) INVESTMENT COMMITTEE, :
And JOHN DOES 1-10, :

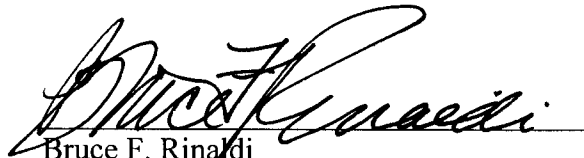
Defendants. :

-----X
WILLIAM and PATRICIA WOODWARD, :
individually and on Behalf of All Others :
Similarly Situated, :
:
Plaintiffs, : Civil Action No: 07cv11207
v. :
:
CITIGROUP INC., CHARLES PRINCE, :
ROBERT E. RUBIN, C. MICHAEL :
ARMSTRONG, ALAIN J. P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, ROBERTO :
HERNANDEZ RAMIREZ, ANDREW N. :
LIVERIS, ANN MULCAHEY, RICHARD :
D. PARSONS, JUDITH RODIN, ROBERT :
L. RYAN, FRANKLIN A. THOMAS, ANN :
DIBBLE JORDAN, KLAUS KLEINFELD :
AND DUDLEY C. MECUM, and JOHN :
and JANE DOES 1-10, :
:
Defendants. :

1. I am an attorney with the law firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
2. I submit this Declaration in support of the motion of Lynda J. Grant for my admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto as Exhibit 1, I am a member in good standing of the Bar of the District of Columbia, admitted June 6, 1997, Bar No. 455187.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. Wherefore, your declarant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in the above captioned cases.

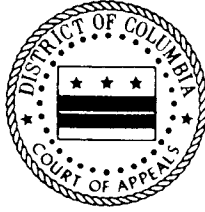
I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated January 10, 2008

A handwritten signature in black ink, appearing to read "Bruce F. Rinaldi", is written over a horizontal line.

Bruce F. Rinaldi
Cohen, Milstein, Hausfeld & Toll, P.L.L.C.
1100 New York Ave., NW, Suite 500 West
Washington, DC 20005
Phone: (202) 408-4600
Fax: (202) 408-4699

EXHIBIT 1



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

Bruce F. Rinaldi

was on the 6th day of June, 1997
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on January
9, 2008.

GARLAND PINKSTON, JR., CLERK

By: Michelle Chase
Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	
STEPHEN GRAY, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	
SHAUN ROSE, Individually and On	:
Behalf of All Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 10,	:
	:
Defendants.	:
-----X	
MEREDITH TRANBERG, individually	:
and on behalf of all others similarly situated	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.,	:
THE 401(k) INVESTMENT	:
COMMITTEE, and JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 9790 (SHS)

Civil Action No: 07 Civ. 10294

Civil Action No: 07 Civ. 10341

-----X
ANTON RAPPOLD, individually and on :
behalf of all others similarly situated, :
 :
 :
Plaintiff, : Civil Action No: 07 Civ. 10396
v. :
 :
 :
CITIGROUP INC., CITIBANK, N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and JOHN :
and JANE DOES 1 - 10, :
 :
 :
Defendants. :
-----X

SAMIER TADROS, on Behalf of All :
Others Similarly Situated, :
 :
 :
Plaintiff, : Civil Action No: 07 Civ. 10442
v. :
 :
 :
CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC.) :
and JOHN DOES 21-40 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE INVESTMENT COMMITTEE :
OF THE CITIGROUP INC. 401(K) PLAN), :
 :
 :
Defendants. :
-----X

-----X	
STEPHAN FIORINO, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CITIBANK N.A.,	:
CHARLES PRINCE, THE PLANS	:
ADMINISTRATIVE COMMITTEE OF	:
CITIGROUP INC., THE 401(k)	:
INVESTMENT COMMITTEE, and	:
JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	
JAMES BOLLA, individually and on behalf	:
of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CITIBANK N.A.,	:
CHARLES PRINCE, THE PLANS	:
ADMINISTRATIVE COMMITTEE OF	:
CITIGROUP INC., THE 401(k)	:
INVESTMENT COMMITTEE, and	:
JOHN DOES 1 - 20,	:
	:
Defendants.	:
-----X	

Civil Action No: 07 Civ. 10458

Civil Action No: 07 Civ. 10461

-----X
MARK GEROULO, individually, on behalf :
of the CITIGROUP 401(k) Plan, the :
CITIBUILDER 401 (K) PLAN FOR :
PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :
THE PLAN ADMINISTRATIVE :
COMMITTEE OF CITIGROUP, INC., :
MICHAEL E. SCHLEIN, JOHN DOES :
1-10, THE CITIGROUP 401(k) PLAN :
INVESTMENT COMMITTEE and JOHN :
DOES 10-20, C. MICHAEL :
ARMSTRONG, ALAN J.P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, ROBERTO :
HERNANDEZ, ANN DIBBLE JORDAN, :
ANDREW N. LIVERIS, DUDLEY C. :
MECUM, ANNE M. MULCAHY, :
RICHARD D. PARSONS, ANDRALL E. :
PEARSON, CHARLES PRINCE, JUDITH :
RODIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X
ALAN STEVENS, on Behalf of Himself :
and All Others Similarly Situated, :
 :
 :
Plaintiff, : Civil Action No: 07 Civ. 11156
v. :
 :
CITIGROUP INC., CITIBANK, N.A, :
CHARLES PRINCE, C. MICHAEL :
ARMSTRONG, ALAIN J.P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, PETER JOHNSON, :
ROBERTO HERNANDEZ RAMIREZ, :
ANDREW N. LIVERIS, ANNE :
MULCAHEY, RICHARD D. PARSONS, :
JUDITH RODIN, ROBERT E. RUBIN, :
ROBERT L. RYAN, FRANKLIN A. :
THOMAS, THE PLANS :
ADMINISTRATION COMMITTEE OF :
CITIGROUP, INC., THE INVESTMENT :
COMMITTEE and JOHN DOES 1-30, :
 :
 :
Defendants. :
-----X

STEPHEN GOLDSTEIN, on Behalf of :
Himself and a Class of Persons Similarly :
Situated, :
 :
 :
Plaintiff, : Civil Action No: 07 Civ. 11158
v. :
 :
CITIGROUP INC., THE PLANS :
ADMINISTRATION COMMITTEE OF :
CITIGROUP, INC., MICHAEL E. :
SCHLEIN, CHARLES PRINCE, C. :
MICHAEL ARMSTRONG, ALAIN J.P. :
BELDA, GEORGE DAVID, KENNETH T. :
DERR, JOHN M. DEUTCH, ROBERTO :
HERNANDEZ RAMIREZ, ANDREW N. :
LIVERIS, ANNE MULCAHEY, :
RICHARD D. PARSONS, JUDITH :
RODIN, ROBERT E. RUBIN, ROBERT L. :
RYAN, AND FRANKLIN A. THOMAS, :
And JOHN DOES 1-30, :
 :
 :
Defendants. :
-----X

CHRIS SOUTHARD, on Behalf of All
Others Similarly Situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC.) :
and JOHN DOES 21-40 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE INVESTMENT COMMITTEE :
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants.

FRANCIA BRICK, individually and on
Behalf of all others similarly situated,

Plaintiff,

V.

CITIGROUP INC., CHARLES PRINCE, :
THE PLAN'S ADMINISTRATIVE :
COMMITTEE OF CITIGROUP, INC., :
THE 401(k) INVESTMENT COMMITTEE,:
And JOHN DOES 1-10, :

Defendants.

-----X	
WILLIAM and PATRICIA WOODWARD, :	
individually and on Behalf of All Others :	
Similarly Situated, :	
Plaintiffs, :	Civil Action No: 07cv11207
v. :	
CITIGROUP INC., CHARLES PRINCE, :	
ROBERT E. RUBIN, C. MICHAEL :	
ARMSTRONG, ALAIN J. P. BELDA, :	
GEORGE DAVID, KENNETH T. DERR, :	
JOHN M. DEUTCH, ROBERTO :	
HERNANDEZ RAMIREZ, ANDREW N. :	
LIVERIS, ANN MULCAHEY, RICHARD :	
D. PARSONS, JUDITH RODIN, ROBERT :	
L. RYAN, FRANKLIN A. THOMAS, ANN :	
DIBBLE JORDAN, KLAUS KLEINFELD :	
AND DUDLEY C. MECUM, and JOHN :	
and JANE DOES 1-10, :	
Defendants. :	

**[PROPOSED] ORDER GRANTING APPLICATION OF
BRUCE F. RINALDI FOR ADMISSION *PRO HAC VICE***

This matter coming before the Court by Motion submitted by Lynda J. Grant, seeking the admission of Bruce F. Rinaldi to the United States District Court for the Southern District of New York *pro hac vice* for purposes of this action, and the Court having considered the Affidavit of Bruce F. Rinaldi submitted in support thereof, and for good cause shown,

IT IS ON this _____ day of _____, 2008,

ORDERED that:

1. Bruce F. Rinaldi is hereby granted admission *pro hac vice* to the United States District Court for the Southern District of New York, for the purpose of

appearing in this action, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York;

2. Bruce F. Rinaldi is required to abide by and is subject to the Local Rules of the United States District Court for the Southern District of New York; and

3. Bruce F. Rinaldi is required to notify the Court immediately of any matter that affects his standing at the Bar of any court.

United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X			
STEPHEN GRAY, individually and on	:	CERTIFICATE OF SERVICE	
behalf of all others similarly situated,	:		
	:		
Plaintiff,	:		Civil Action No: 07 Civ. 9790 (SHS)
v.	:		
	:		
CITIGROUP INC., CHARLES PRINCE,	:		
THE PLANS ADMINISTRATIVE	:		
COMMITTEE OF CITIGROUP INC.,	:		
THE 401(k) INVESTMENT	:		
COMMITTEE, and JOHN DOES 1 - 20,	:		
	:		
Defendants.	:		
-----X			
SHAUN ROSE, Individually and On	:	Civil Action No: 07 Civ. 10294	
Behalf of All Others Similarly Situated,	:		
	:		
Plaintiff,	:		
v.	:		
	:		
CITIGROUP INC., CHARLES PRINCE,	:		
THE PLANS ADMINISTRATIVE	:		
COMMITTEE OF CITIGROUP INC.,	:		
THE 401(k) INVESTMENT	:		
COMMITTEE, and JOHN DOES 1 - 10,	:		
	:		
Defendants.	:		
-----X			
MEREDITH TRANBERG, individually	:	Civil Action No: 07 Civ. 10341	
and on behalf of all others similarly situated	:		
	:		
Plaintiff,	:		
v.	:		
	:		
CITIGROUP INC., CHARLES PRINCE,	:		
THE PLANS ADMINISTRATIVE	:		
COMMITTEE OF CITIGROUP INC.,	:		
THE 401(k) INVESTMENT	:		
COMMITTEE, and JOHN DOES 1 - 20,	:		
	:		
Defendants.	:		
-----X			

-----X
ANTON RAPPOLD, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK, N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and JOHN :
and JANE DOES 1 - 10, :

Defendants. :

Civil Action No: 07 Civ. 10396

-----X
SAMIER TADROS, on Behalf of All :
Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC.) :
and JOHN DOES 21-40 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE INVESTMENT COMMITTEE :
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

Civil Action No: 07 Civ. 10442

-----X

-----X
STEPHAN FIORINO, individually and on :
behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10458

-----X
JAMES BOLLA, individually and on behalf :
of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CITIBANK N.A., :
CHARLES PRINCE, THE PLANS :
ADMINISTRATIVE COMMITTEE OF :
CITIGROUP INC., THE 401(k) :
INVESTMENT COMMITTEE, and :
JOHN DOES 1 - 20, :

Defendants. :

Civil Action No: 07 Civ. 10461

-----X

-----X
 MARK GEROULO, individually, on behalf :
 of the CITIGROUP 401(k) Plan, the :
 CITIBUILDER 401 (K) PLAN FOR :
 PUERTO RICO, and all others similarly, :

Plaintiff, :

v. :

CITIGROUP, INC., CITIBANK, N.A., :
 THE PLAN ADMINISTRATIVE :
 COMMITTEE OF CITIGROUP, INC., :
 MICHAEL E. SCHLEIN, JOHN DOES :
 1-10, THE CITIGROUP 401(k) PLAN :
 INVESTMENT COMMITTEE and JOHN :
 DOES 10-20, C. MICHAEL :
 ARMSTRONG, ALAN J.P. BELDA, :
 GEORGE DAVID, KENNETH T. DERR, :
 JOHN M. DEUTCH, ROBERTO :
 HERNANDEZ, ANN DIBBLE JORDAN, :
 ANDREW N. LIVERIS, DUDLEY C. :
 MECUM, ANNE M. MULCAHY, :
 RICHARD D. PARSONS, ANDRALL E. :
 PEARSON, CHARLES PRINCE, JUDITH :
 RODIN, ROBERT E. RUBIN, FRANKLIN :
 A. THOMAS, SANFORD I. WEILL, :

Defendants. :

Civil Action No: 07 Civ. 10472

-----X

-----X
ALAN STEVENS, on Behalf of Himself :
and All Others Similarly Situated, :
:
Plaintiff, :
v. :
:
CITIGROUP INC., CITIBANK, N.A, :
CHARLES PRINCE, C. MICHAEL :
ARMSTRONG, ALAIN J.P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, PETER JOHNSON, :
ROBERTO HERNANDEZ RAMIREZ, :
ANDREW N. LIVERIS, ANNE :
MULCAHEY, RICHARD D. PARSONS, :
JUDITH RODIN, ROBERT E. RUBIN, :
ROBERT L. RYAN, FRANKLIN A. :
THOMAS, THE PLANS :
ADMINISTRATION COMMITTEE OF :
CITIGROUP, INC., THE INVESTMENT :
COMMITTEE and JOHN DOES 1-30, :
:
Defendants. :

Civil Action No: 07 Civ. 11156

-----X
STEPHEN GOLDSTEIN, on Behalf of :
Himself and a Class of Persons Similarly :
Situating, :
:
Plaintiff, :
v. :
:
CITIGROUP INC., THE PLANS :
ADMINISTRATION COMMITTEE OF :
CITIGROUP, INC., MICHAEL E. :
SCHLEIN, CHARLES PRINCE, C. :
MICHAEL ARMSTRONG, ALAIN J.P. :
BELDA, GEORGE DAVID, KENNETH T. :
DERR, JOHN M. DEUTCH, ROBERTO :
HERNANDEZ RAMIREZ, ANDREW N. :
LIVERIS, ANNE MULCAHEY, :
RICHARD D. PARSONS, JUDITH :
RODIN, ROBERT E. RUBIN, ROBERT L. :
RYAN, AND FRANKLIN A. THOMAS, :
And JOHN DOES 1-30, :
:
Defendants. :

Civil Action No: 07 Civ. 11158

-----X
CHRIS SOUTHARD, on Behalf of All :
Others Similarly Situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES O. :
PRINCE, C. MICHAEL ARMSTRONG, :
ALAIN J.P. BELDA, GEORGE DAVID, :
KENNETH T. DERR, JOHN M. DEUTCH, :
ROBERTO HERNANDEZ RAMIREZ, :
ANN DIBBLE JORDAN, KLAUS :
KLEINFELD, ANDREW N. LIVERIS, :
ANNE MULCAHY, RICHARD D. :
PARSONS, JUDITH RODIN, ROBERT E. :
RUBIN, ROBERT E. RUBIN, FRANKLIN :
A. THOMAS, JOHN DOES 1-20 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE PLANS ADMINISTRATIVE :
COMMITTEE OF CITIGROUP INC.) :
and JOHN DOES 21-40 (BEING :
CURRENT AND FORMER MEMBERS :
OF THE INVESTMENT COMMITTEE :
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

FRANCIA BRICK, individually and on :
Behalf of all others similarly situated, :

Plaintiff, :

v. :

CITIGROUP INC., CHARLES PRINCE, :
THE PLAN'S ADMINISTRATIVE :
COMMITTEE OF CITIGROUP, INC., :
THE 401(k) INVESTMENT COMMITTEE, :
And JOHN DOES 1-10, :

Defendants. :

Civil Action No: 07 Civ. 11164

:

Civil Action No: 07 Civ. 11369

-----X
WILLIAM and PATRICIA WOODWARD, :
individually and on Behalf of All Others :
Similarly Situated, :

Plaintiffs, :

v. :

CITIGROUP INC., CHARLES PRINCE, :
ROBERT E. RUBIN, C. MICHAEL :
ARMSTRONG, ALAIN J. P. BELDA, :
GEORGE DAVID, KENNETH T. DERR, :
JOHN M. DEUTCH, ROBERTO :
HERNANDEZ RAMIREZ, ANDREW N. :
LIVERIS, ANN MULCAHEY, RICHARD :
D. PARSONS, JUDITH RODIN, ROBERT :
L. RYAN, FRANKLIN A. THOMAS, ANN :
DIBBLE JORDAN, KLAUS KLEINFELD :
AND DUDLEY C. MECUM, and JOHN :
and JANE DOES 1-10, :

Civil Action No: 07cv11207

CERTIFICATE OF SERVICE

I, Theresa Graham, hereby certify that I am over the age of 18, and am employed by the Law Firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C. On this 15th day of January, 2008, I caused true and accurate copies of the foregoing Motion to Admit Counsel *Pro Hac Vice*, Declaration of Lynda J. Grant in Support of Motions to Admit Counsel *Pro Hac Vice*, Declaration of Bruce F. Rinaldi in Support of Motion to Admit Counsel *Pro Hac Vice* and the Certificate of Good Standing attached thereto, and Proposed Order for Admission *Pro Hac Vice* on Written Motion, via First-Class mail, upon the following counsel of record:

Citigroup ERISA Litigation Service List

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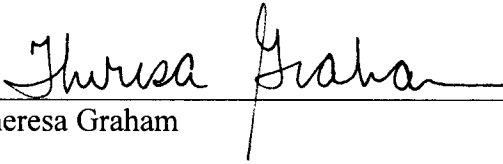
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